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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PEGGY CALDERON TROTMAN,

Plaintiff,

-against-

DELTA AIRLINES, INC.,

Defendant.

Docket No.: 1:21-cv-04441-JGK

**RULE 26(f) REPORT &
PROPOSED DISCOVERY PLAN**

Schedule D only

The parties have conferred pursuant F.R.C.P. 26(f) pursuant to this Court's Order dated July 14, 2021, and hereby submit the following proposed joint discovery plan:

A. What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement as to when disclosures under Rule 26(a)(1) were made or will be made:

- The parties shall serve their Initial Disclosures by August 10, 2021.
- B. The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues:
 - Discovery is needed concerning all allegations contained in Plaintiff's Complaint, Plaintiff's claimed injuries and medical treatment, and any special damages that will be claimed.
 - Written Discovery:
 - Parties shall serve document requests and interrogatories by August 17, 2021.
 - Parties shall respond to document requests and interrogatories by September 24, 2021.
 - Depositions:
 - The deposition of Plaintiff shall occur on or before October 25, 2021.
 - The deposition of Defendant shall occur on or before November 19, 2021.
 - Amendment of Pleadings:
 - Parties shall amend their pleadings by January 14, 2022.
 - Expert Discovery:
 - Affirmative expert reports shall be served by February 1, 2022.
 - Rebuttal expert reports shall be served by March 1, 2022.

Complete expert discovery by April 1, 2022.

- C. Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced.
 - There are no issues at this time and the parties do not anticipate such issues in the future.
- D. Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production – whether to ask the court to include in their agreement and order under Federal Rule of Evidence 502.
 - There are no issues at this time.
- E. What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed.
 - The parties do not believe that any changes or additional limitations are necessary.
- F. Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).
 - Defendant to serve proposed Confidentiality Order on Plaintiff within thirty (30) days of the Initial Conference.

Dated: New York, New York
July 27, 2021

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/s/ David Roth

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Disposition motions due April 27, 2022.

*Joint Pre-Trial Order due 5/13/22 or 21 days after decision
Any dispositive motion
Ready Trial, 48 hours notice, 14 days after submission of
the Joint Pre-Trial Order.
Parties should advise CCP by 8/10/21 whether they
consent to trial before the Magistrate Judge.*

*So ordered.
John C. Kollett/d.s.-DS.*